

# **ATTACHMENT A**

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**From:** Clayton Wiggins <cwiggins@wilkinsonstekloff.com>  
**Sent:** Friday, October 20, 2023 8:30 PM  
**To:** Viebrock, Sarah L.; Parsigian, Jeanifer; Wyson, Natali; Dale, Adam I.; RB-Robert Fuller; Baucom, Marilyn; Beth Wilkinson; Rakesh Kilaru; Kieran Gostin; Cali Arat; Max Warren; Sarah Neuman; Tamarra Matthews Johnson; jacob.danziger@afslaw.com; Kacy.Rayburn@afslaw.com; rey.caling@afslaw.com; MB-Britt Miller; MB-Matt Provance; cjkelly@mayerbrown.com; MB - Jessica Maurer; RB-Lawrence Moore; RB-Amanda Nitto; Hinman, Travis; Raynor, Jake; Hill, Patrick; mseifert@szllp.com; wsomvichian@cooley.com; khartnett@cooley.com; mlambert@cooley.com; dbansal@cooley.com; acorkery@cooley.com; dlouk@cooley.com; ahernaez@foxrothschild.com; FC-Erik Albright; FR - Greg Holland; SC-Jonathan Heyl; EMartin@foxrothschild.com; PS-Leane Capps; PN - Amy Fitts; PZeeck@polsinelli.com; whurst@polsinelli.com; rfernandez@mayerbrown.com; cdodd@mayerbrown.com; Anna.Rathbun@lw.com; Aaron.Chiu@lw.com; Chris.Yates@lw.com; agould@polsinelli.com; monique.handy-jones@lw.com; Linda.Tam@lw.com; kmurray@polsinelli.com; GDelTatto@mayerbrown.com; christine.greeley@lw.com; Jack.Siddoway@lw.com; jsip@cooley.com; rtarneja@cooley.com; Hummel, Chad S.; Anderson, David; Zambrano, Angela; Misner, Tim; Julian Jiggetts; Robert Laird; Matthew Skanchy  
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**Subject:** RE: In re College Athlete NIL - Deposition Scheduling

Sarah,

As I stated in my earlier email below, Defendants intend to pursue the document requests from Huron Consulting Group and Deloitte. Judge Cousins' order related to *witness disclosures*, not document discovery. Merits discovery is still open and we see no basis for Plaintiffs to object to our pursuit of that discovery. Indeed, Plaintiffs not only produced to Defendants a number of documents you received pursuant to non-party subpoenas earlier today but in fact demanded further document productions from Defendants, underscoring the complete lack of prejudice to Plaintiffs from the Parties pursuing document discovery at this time.

We will of course, consistent with the Joint Stipulation and Order Regarding Third-Party Productions in Response to Subpoenas entered in this case on January 6, 2022, serve Plaintiffs with the production of any documents we receive pursuant to our subpoenas.

Best,  
Clayton

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**Subject:** RE: In re College Athlete NIL - Deposition Scheduling

Clayton,

Following up on Jen's email below. Please let us know your position on the document requests so that Plaintiffs can proceed accordingly.

Thank you,  
Sarah

**Sarah L. Viebrock**

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**WINSTON  
& STRAWN**  
LLP

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**Subject:** Re: In re College Athlete NIL - Deposition Scheduling

Clayton,

Plaintiffs object to Defendants continuing to pursue document discovery from these two newly disclosed sources. Judge Cousins found that these disclosures were late, and allowed Defendants to rely on only 4 of the 12 sources of newly disclosed discovery to mitigate the prejudice to plaintiffs. Defendants' pursuit of documents from 2 of the sources in addition to identifying 4 sources that you intend to rely on for testimony exceeds what he has allowed. We ask that you reconsider withdrawing the subpoenas or plaintiffs will seek to exclude any discovery obtained therefrom.

Best,  
Jeanifer

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**From:** Clayton Wiggins <[cwiggins@wilkinsonstekloff.com](mailto:cwiggins@wilkinsonstekloff.com)>

**Sent:** Monday, October 16, 2023 4:20:48 PM

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**Subject:** RE: In re College Athlete NIL - Deposition Scheduling

Hi Jeanifer,

Defendants intend to withdraw the subpoenas for 30(b)6 testimony served on Huron Consulting Group and Deloitte, but will continue to pursue the document requests.

Best,  
Clayton

**Clayton Wiggins** | Associate

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**Sent:** Monday, October 16, 2023 10:17 AM

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**Subject:** RE: In re College Athlete NIL - Deposition Scheduling

Counsel,

Please confirm that you intend to withdraw the document subpoenas served on Huron Consulting Group and Deloitte as they are not among the 4 newly relevant disclosures listed below.

Best,  
Jeanifer

**Jeanifer Parsigian**

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**Subject:** RE: In re College Athlete NIL - Deposition Scheduling

Counsel,

The conference Defendants will facilitate the scheduling of the depositions for Blake James, Candice Storey Lee, Mack Rhoades, and Chad Weiberg. With regard to Mark Harlan and Ray Tanner, the Defendants will agree to withdraw their disclosures as witnesses.

Regarding the other "Categorical" and "Newly Relevant" witnesses, please see below for our disclosures.

Categorical Disclosures:

1. John Cunningham
2. Jamie Pollard
3. Caryl Smith-Gilbert
4. Darin Spease

Newly Relevant Disclosures:

1. Phil Andrews
2. Frank Busch
3. Rocky Harris
4. Morgan Fuller Kolsrud

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**Subject:** RE: In re College Athlete NIL - Deposition Scheduling

Counsel,

I am following up on the below. Given the very short time period for these depositions, we would like to begin scheduling them as soon as possible. Notifying us of who to contact to do so should not require a lengthy deliberation. Please provide this information today.

We also await Defendants' lists of "Categorical Disclosures" witnesses and "Newly Relevant" witnesses. We assume that Mr. Spease is one of them given the correspondence from the SEC this week concerning logistics for his deposition on Monday.

Best,  
Adam

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**From:** Dale, Adam I.

**Sent:** Wednesday, October 11, 2023 3:12 PM



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**Subject:** In re College Athlete NIL - Deposition Scheduling

Counsel,

Pursuant to Judge Cousins' Order Resolving Discovery Dispute About Defendants' Supplemental Initial Disclosures (ECF No. 374), we would like to begin scheduling depositions of the "April 2023 Declarants." Please let us know if Defendants will facilitate scheduling the depositions of any or all of the six school administrators: Mark Harlan, Blake James, Candice Storey Lee, Mack Rhoades, Ray Tanner, and Chad Weiberg.

In addition, on Friday, when Defendants identify their selected four "Categorical Disclosures" witnesses and four "Newly Relevant" witnesses, please include a notation of whether any of the depositions may be scheduled through Defendants.

Thanks,  
Adam

**Adam I. Dale**

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